



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

January 21, 2011

Ms. Stacy Mason – KEC-4  
Project Environmental Lead  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208

Re: U.S. Environmental Protection Agency (EPA) comments on the Draft Environmental Impact Statement for the Big Eddy-Knight Transmission Project (EPA Project Number 09-030-DOE)

Dear Ms. Mason:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DEIS) for the proposed Big Eddy-Knight Transmission Project in Wasco County, Oregon and Klickitat County, Washington in accordance with the National Environmental Policy Act (NEPA) and §309 of the Clean Air Act (CAA). Section 309 of the CAA requires EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The DEIS analyzes potential environmental impacts associated with a proposal to construct, operate, and maintain a 500-kV transmission line that would extend from BPA's Big Eddy Substation near The Dalles, Oregon to a proposed Knight Substation approximately 4 miles northwest of Goldendale, Washington. The project also includes installation of new fiber optic cable for system communications. The DEIS analyzes three routing alternatives for the transmission line (West, Middle, and East). The DEIS also analyzes two sites for the proposed Knight substation, and two fiber optic cable configurations. The East alternative is identified as the preferred alternative.

EPA is supportive of the selection of the East Alternative as it minimizes impact to the Columbia Gorge National Scenic Area, and terrestrial vegetation. We appreciate the effort made by BPA to utilize existing corridors and to minimize impacts to sensitive resources in the project area. We favor the installation of double circuit towers and the removal of existing towers where feasible. This would limit the overall right-of-way requirements of the project; the visual impact of the project; and exposure to electro-magnetic frequencies.

Based on our analysis, we are assigning a rating of LO (lack of objections) to the DEIS. We do however, have recommendations related to invasive species management and end-of-life issues for existing infrastructure that we believe should be addressed in the FEIS. These recommendations are detailed below:

**Invasive Species**

The DEIS notes on page 3-60 that a number of aggressive invasive species are present along the project alternative routes. In order to lessen the risk of introducing or spreading noxious weeds during and after construction and throughout the life of the line, the DEIS lists several mitigation measures, including (1) a commitment to conduct invasive weed surveys prior to and following construction to determine potential weed spread and appropriate corrective action; and (2) a commitment to collaborate with the Klickitat County Weed Board or Wasco County Weed Department and landowners to determine and carry out the best control measures deemed locally effective. These are important and necessary actions, and we believe they warrant further discussion. As the FEIS is developed, we encourage you to provide additional detail related to both of these measures, or to make an Early Detection Rapid Response Plan (EDRR) available for review on the BPA website or as an appendix to the FEIS. Key elements include the following:

- Timing and frequency of invasives monitoring
- Active and passive monitoring protocols
- Who will be responsible for monitoring
- Who will be responsible for weed treatment/removal
- Treatment options (hand pulling, mowing, cultural controls, biological controls, herbicide)
- A decision key that can help managers determine appropriate treatment options (based on the size, location and nature of the infestation).

An example of an EDRR strategy and decision key can be found in the FEIS and Record of Decision for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon. These documents are available at <http://www.fs.fed.us/r6/invasiveplant-eis/site-specific/MTH/>

**Existing infrastructure**

The East Alternative proposes to remove the existing towers along the Harvalum-Big Eddy line and the McNary-Ross line. We favor this approach, but recognize that deconstruction will be a significant activity and that it will generate a large surplus of material. We appreciate the inclusion of a mitigation measure calling for a plan to recycle or salvage non hazardous construction and demolition debris (DEIS p. 3-169), but recommend that additional detail be included in the FEIS related to materials management (amount of material to be generated, nature of that material, and alternatives for staging and disposal). How deconstruction materials are managed will determine in large part the overall resource intensity of the proposed project. We further recommend that the FEIS discuss targets for percent of materials to be salvaged or recycled.

We appreciate the opportunity to comment on the DEIS. If you have any questions about our comments, I encourage you to contact Teresa Kubo of my staff at 503-326-2859 or at [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large, stylized initial 'C'.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.